

**To:** Robert Law[rlaw@demaximis.com]  
**From:** Vaughn, Stephanie  
**Sent:** Tue 1/6/2015 9:39:02 PM  
**Subject:** Bioaccumulation model...  
CPG-Bio-Model-Burkhard-Comments\_Final.docx

Hi Rob,

Attached is a memo prepared by Lawrence Burkhard, a Research Chemist with EPA's Office of Research and Development. He was asked by EPA to complete a preliminary review of the draft bioaccumulation model spreadsheets submitted by the CPG on December 18, 2013. As such, these comments do not constitute a complete review of either the earlier or any later versions of the model or model spreadsheets submitted, and may be superseded and/or appended by additional comments.

EPA is sharing these comments at this time at the request of the CPG, in preparation for an upcoming meeting to discuss issues related to the model. So as to maximize the productiveness of the January 27, 2015 technical meeting, additional technical concerns with the CPG's bioaccumulation model and depth of exposure assumptions may be forwarded prior to the meeting. Accordingly, EPA anticipates that the CPG will also provide additional rationale/technical justification for their positions, as well as agenda topics, prior to the meeting.

Thanks,

Stephanie